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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
14 Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	
15 v.	)	
	)	
16 STEPHEN KEITH CHAMBERLAIN,	)	
	)	
17 Defendant.	)	
	)	
18 _____	)	

19 **STIPULATION**

20 WHEREAS, on November 29, 2018, the Grand Jury returned an Indictment against Stephen  
21 Keith Chamberlain, a resident of the United Kingdom [ECF No. 1];

22 WHEREAS, on February 4, 2019, defendant Chamberlain (“the defendant”) appeared before the  
23 Court (with counsel specially appearing), was arraigned on the Indictment, and pleaded not guilty to all  
24 counts;

25 WHEREAS, on March 21, 2019, the Grand Jury returned a Superseding Indictment against  
26 Chamberlain [ECF No. 21];

27  
28  
STIPULATION AND [PROPOSED] ORDER  
CASE NO. CR 18-577 CRB

1 WHEREAS, on January 23, 2020, the Court entered a protective order respecting certain  
2 discovery;

3 WHEREAS, on January 27, 2020, the government produced a substantial volume of discovery to  
4 the defendant, including materials subject to the protective order;

5 WHEREAS, on February 21, 2020, the government made an additional production of discovery  
6 to the defendant;

7 WHEREAS, this matter was scheduled for status conference on April 15, 2020, at 1:30 p.m;

8 WHEREAS, on March 16, 2020, the Court issued General Order No. 72 (IN RE: Coronavirus  
9 Disease Public Health Emergency), providing that “due to the Court’s reduced ability to obtain an  
10 adequate spectrum of jurors and the effect of the above public health recommendations on the  
11 availability of counsel and court staff to be present in the courtroom, the time period of the continuances  
12 implemented by this General Order will be excluded under the Speedy Trial Act, as the Court  
13 specifically finds that the ends of justice served by ordering the continuances outweigh the interest of the  
14 public and any defendant’s right to a speedy trial pursuant to 18 U.S.C. section 3161(h)(7)(A)”;

15 WHEREAS, on March 29, 2020, the Court issued a Clerk’s Notice Vacating Status Conference  
16 on April 15, 2020, and resetting it for June 17, 2020;

17 WHEREAS, the parties stipulate and agree that an exclusion of time under the Speedy Trial Act  
18 from April 15, 2020, to June 17, 2020, is appropriate due to the complexity of the case, the need for  
19 defense counsel to review relevant evidence including recently produced discovery, consult with the  
20 defendant in the United States, and effectively prepare, and the ongoing Coronavirus pandemic;

21 THEREFORE, the parties stipulate and agree, and respectfully request that the Court order, that  
22 excluding time from April 15, 2020, to June 17, 2020, will allow for the effective preparation of counsel  
23 given the complexity of the case. *See* 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv). The parties further stipulate  
24 and agree that the ends of justice served by excluding the time from April 15, 2020, to June 17, 2020,  
25 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant  
26 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii) & (iv). The parties stipulate and agree the Court  
27 shall enter the proposed order below.

28 IT IS SO STIPULATED.

1 DATED: March 31, 2020

DAVID L. ANDERSON  
United States Attorney

2  
3 /s/

ROBERT S. LEACH  
Assistant United States Attorney

4 DATED: March 31, 2020

BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG, & RHOW,  
P.C.

7 /s/

8 ARIEL A. NEUMAN  
Attorneys for Defendant Stephen Chamberlain

9  
10 **[PROPOSED] ORDER**

11 Based upon the facts set forth in the stipulation of the parties and the representations made to the  
12 Court, and for good cause shown, the Court finds that failing to exclude the time from April 15, 2020, to  
13 June 17, 2020, would unreasonably deny defense counsel and the defendant the reasonable time  
14 necessary for effective preparation, taking into account the exercise of due diligence and the complexity  
15 of the case. 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv). The Court further finds that the ends of justice served  
16 by excluding the time from April 15, 2020, to June 17, 2020, from computation under the Speedy Trial  
17 Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the  
18 consent of the parties, IT IS HEREBY ORDERED that the time from April 15, 2020, to June 17, 2020,  
19 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii) &  
20 (iv).

21 IT IS SO ORDERED.

22 DATED:

23  
24 THE HONORABLE CHARLES R. BREYER  
United States District Judge